22

23

24

25

26

27

28

1 MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 2 DONNA M. WITTIG, ESQ. Nevada Bar No. 11015 3 AKERMAN LLP 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 Telephone: (702) 634-5000 5 Facsimile: (702) 380-8572 Email: melanie.morgan@akerman.com 6 Email: donna.wittig@akerman.com 7 Attorneys for Plaintiff Nationstar Mortgage LLC 8 9 10 NATIONSTAR MORTGAGE LLC, 11 12 13 v.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Plaintiff.

THUNDER PROPERTIES, INC.,

Defendant.

STIPULATION AND **ORDER** TENSION OF PLAINTIFF NATIONSTAR MORTGAGE LLC'S DEADLINE TO FILE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

Case No.: 2:17-cv-00713-JAD-NJK

[FIRST REQUEST]

Plaintiff Nationstar Mortgage LLC (Nationstar) and Defendant Thunder Properties, Inc. (**Thunder**), by and through their respective counsel of record, stipulate as follows:

- 1. Nationstar filed its motion for summary judgment on Tuesday, December 10, 2019 [ECF No. 39].
- 2. Thunder received four extensions to file its response due to the parties ongoing settlement discussions, filing its opposition to Nationstar's motion for summary judgment on Tuesday, February 25, 2020 [ECF No. 48].
- 3. The deadline for Nationstar to reply in support of its motion for summary judgment was Tuesday, March 10, 2020 [ECF No. 48]. Regarding excusable neglect, undersigned counsel for Nationstar thought the deadline had not vet passed, instead thinking it was coming up soon. In checking her calendar today, she realized the deadline was yesterday. (Undersigned counsel did, as she routinely does each day, printed her daily calendar yesterday but somehow overlooked the

20

21

22

23

24

25

26

27

28

1

2

3

4

5

6

7

8

9

10

deadline.) Upon realizing the deadline passed, she promptly reached out to Thunder's counsel to request the current extension of time.

- 4. The parties stipulate and agree that Nationstar shall have up to and until **Friday**, March 20, 2020 to file its reply in support of its motion for summary judgment.
- 5. This is the first request for an extension of this reply deadline and is not made for purposes of undue delay. The extension is requested due to issues raised in Thunder's opposition that require investigation from not only Nationstar but also prior servicers, which information could impact the parties' ability to resolve this case on their own without the court having to rule on Nationstar's summary judgment motion.

DATED: March 11th, 2020.

					•	•	-
ΙA	KE	'RN	ΛſΔ	N		,	P

/s/ Donna M. Wittig

MELANIE D. MORGAN, ESO.

Nevada Bar No. 8215

DONNA M. WITTIG, ESQ.

Nevada Bar No. 11015

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

Attorneys for Plaintiff Nationstar Mortgage LLC

ROGER P. CROTEAU & ASSOCIATES, LTD.

/s/ Timothy E. Rhoda

ROGER P. CROTEAU, ESO.

Nevada Bar No. 4958

TIMOTHY E. RHODA, ESQ.

Nevada Bar No. 7878

2810 West Charleston Boulevard, Suite 75

Las Vegas, Nevada 89102

Attorneys for Defendant Thunder Properties, Inc.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

3/11/2020

DATED